

**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF NEW MEXICO**

**STATE OF NEW MEXICO, *ex rel.*  
State Engineer**

**Plaintiff,**

**v.**

**RAMON ARAGON, *et al.*,**

**Defendants.**

**69cv7941 JC**

**RIO CHAMA STREAM SYSTEM**

**THE STATE OF NEW MEXICO'S  
UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE HYDROGRAPHIC SURVEYS AND MAPS**

COMES NOW Plaintiff State of New Mexico *ex rel.* State Engineer ("State") and respectfully requests that the Court grant an extension of time for the filing of the State's hydrographic survey and maps in Section 7 of the Rio Chama Stream system, and in the Rio Cebolla subsection of section 3 of the Rio Chama Stream System. In support of this motion the State asserts:

1. Under the Court's order of July 25, 1995, the State is required to complete and file its hydrographic surveys in sections 3, 5 and 7 no later than June 30, 2000.
2. The State completed and filed its amended hydrographic survey report for section 5 (Rio Gallina) on January 25, 2000.
3. The State completed and filed its hydrographic survey report for the Rio Nutrias subsection of section 3 on May 30, 2000.
4. The State anticipates that it will complete and file its hydrographic survey report for the Canjillon Creek subsection of section 3 by June 30, 2000, as required.

5. The State will be unable to complete the hydrographic survey of the Rio Cebolla subsection of section 3 by June 30, 2000, and will require an additional 30 days to complete and file the hydrographic survey for the Rio Cebolla.

6. The State will also be unable to complete the hydrographic survey for section 7 of the Rio Chama Stream System until the end of 2001. Field work and title verification in this section is still ongoing. Section 7 has been divided into seven subsections (Tierra Amarilla, La Puente, Plaza Blanca, Eseñada/Parkview, Los Brazos, Cañones, and Rio Chamita). The State anticipates that it will be able to complete and file the hydrographic survey for the first subsection of section 7 in September 2000. Additional hydrographic survey reports that cover the remaining subsections should be completed approximately every two months, weather permitting.

7. Counsel for the State has contacted the following individuals concerning this motion, and these persons do not oppose the granting of the State's request for an extension of time: Bradley Bridgewater, David Gehlert, John Utton, Fred Waltz, Mary Humphrey, Chris Coppin, Janelle Haught, Mary Ann Joca, and Benjamin Phillips.

8. Counsel for the State has attempted to contact the following individuals to ascertain whether they would oppose the granting of this motion, but counsel for the State has been unable to make contact or obtain a reply by the time the motion is filed: Annic Coogan, Lester Taylor, Randolph Felker, Jeffrey Fornaciari, Randy Lovato, Wilbert Maez, Peter Shoenfield, Lucas Trujillo, Mott Woolley, Fred Vigil, Steven Brunch, John Farrow and Frank Bond.

WHEREFORE, Plaintiff State of New Mexico *ex rel.* State Engineer prays that the Court issue its Order extending the time for the completion and filing of the State's hydrographic survey for the Rio Cebolla, section 3 of the Rio Chama Stream System, until July 28, 2000, and extend the time

for the completion and filing of the State's hydrographic survey for section 7 of the Rio Chama Stream until December 28, 2001.

Dated June 15, 2000.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that copies of The State of New Mexico's Unopposed Motion for Extension of Time to File Hydrographic Surveys and Maps was mailed to the following persons on June 15, 2000.



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